

TREBICKA EX. K

REDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all other  
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS MOTION TO COMPEL  
REGARDING DISPUTE P3**

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Motion to Compel Regarding Dispute P3.

Having considered Plaintiffs' Motion, and good cause having been shown, the Court

**ORDERS** as follows:

Plaintiffs' Data:

By July 16, 2021, Google shall produce to Plaintiffs all of Plaintiffs' data. This shall include all authenticated and unauthenticated identifiers Google uses to map and track Plaintiffs, and the data so associated with them, including the [REDACTED] listed in GOOG-BRWN-00028920, [REDACTED], and any identifiers that Google keys or maps to those identifiers.

Rule 30(b)(6) Deposition(s):

By July 16, 2021, Google shall produce for testimony an adequately prepared and knowledgeable witness or witnesses designated for Topics 1 through 6 of Plaintiffs' April 27, 2021 Rule 30(b)(6) Deposition Notice. The testimony shall not be limited to Google Analytics or Google Ad Manager; the witness or witnesses shall be prepared to testify about all aspects of Google's logs, databases, storage systems, and data structures containing Plaintiffs' and Class Members' data. The witness or witnesses shall also be prepared to testify about the search tool shown in

1 GOOG-BRWN-00028920. The witness or witnesses shall also be prepared to testify about Topic  
2 5 (Google's preservation of the logs, databases, storage systems, and data structures containing  
3 Plaintiffs' and Class Members' data).

4 Onsite Access to Internal Google Tools and Data:

5 By July 16, 2021, Google shall permit Plaintiffs' attorneys and experts onsite access to a  
6 clean room in which Plaintiffs' attorneys and experts will be permitted to access and use internal  
7 Google tools, logs, and data for purposes of identifying the authenticated and unauthenticated data  
8 concerning the named plaintiffs and their devices. Plaintiffs' attorneys and experts will be granted  
9 access to and use of the following tools and data:

- 10 1. The search tool shown in GOOG-BRWN-00028920;
- 11 2. Any logs, databases, or other data structures containing data and information  
12 concerning the named plaintiffs, their devices, and/or their browsers, whether  
13 authenticated or unauthenticated;
- 14 3. Any additional tools or data necessary for purposes of identifying the authenticated and  
15 unauthenticated identifiers tied to the named plaintiffs, their devices, and/or their  
16 browsers.

17 Google will make these tools and data available at a location of Google's choosing. Google  
18 may supervise Plaintiffs' attorneys and experts' access to and use of these tools and data.

19 Google will also in advance provide Plaintiffs' attorneys and experts with documents  
20 sufficient to guide their use of the tools and data, including documents that describe the data format  
21 and fields.

22 Any access to Google tools and data and any information derived therefrom will be subject  
23 to the terms of the parties' Stipulated Protective Order (Dkt. No. 81).

24 This relief will not prevent or otherwise exclude Plaintiffs from seeking further relief  
25 related to Request for Production Nos. 10 and 18 (Disputes P6 and P3) upon a showing of good  
26 cause.

DATED: \_\_\_\_\_

Honorable Susan van Keulen  
United States Magistrate Judge